

Comments of Arizona Public Service  
Draft 2021 Policy Initiatives Catalog  
Draft Proposal dated February 28, 2020

Arizona Public Service (APS) appreciates the opportunity to provide comments on California Independent System Operators (CAISO) Draft 2021 Policy Initiatives Catalog dated February 28, 2020.

APS recognizes that the volume of stakeholder policy initiative proposals can exceed CAISO's resources and the complexity involved in planning the policy roadmap. APS generally agrees with the planned initiatives in Section 5, especially those involving the Extended Day-Ahead Market (EDAM). APS has identified initiatives it would like to request CAISO prioritize in the roadmap planning process to move into a planned initiative.

2021 Policy Initiative Catalog priority requests:

- **Ability to model tie-gen as MSG (possibly 6.1.28?).**
  - This is an important initiative that we are requesting to be turned into a planned initiative. APS has multiple 2x1 combined cycle units under contract outside our BAA. These are currently only allowed to be modeled/dispatched as simple cycles. We receive incorrect dispatches due to a single 10-step bid curve for a 1x1, 2x1 and 2x1 + duct burner operating range representing multiple heat rate curves. EIM does not recognize a transition cost when ramping unit between MSG configurations. APS does not receive transition signals to start up additional stages. EIM does not recognize transition time to move stages. Since the market model can't match physical model, the market cannot develop accurate solutions which result in ACE deviations.
  
- **Ability for EIM to decommit short start units that are base scheduled.**
  - Concept was proposed at a joint quarterly meeting by an EIM Entity to allow EIM to not start quick-start resources that are base scheduled by EIM Entities, if it is economical to do so while still maintaining the capacity to be called upon due to the fast-start nature if required. The Policy Initiative Catalog does not appear to include an initiative that would consider this change. APS requests the consideration of this initiative to be added or included in existing initiative in the catalog.

APS also noted that item 6.1.40 Extended Pricing Mechanisms may be considered for deletion now that item 5.15.9 Price Formation has been added to the catalog. APS appreciates the ISO's consideration of these comments.